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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ZEIDY M. PONCE CONEJO,

Plaintiff,

vs.

CAROLYN W. COLVIN, Acting Commissioner
Of Social Security,

Defendant.

CIVIL NO. 2:14-cv-01557-MMD-PAL

**DEFENDANT'S UNOPPOSED
MOTION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
MEMORANDUM IN SUPPORT OF
RELIEF REQUESTED IN
PLAINTIFF'S COMPLAINT**

CAROLYN W. COLVIN, Acting Commissioner Of Social Security (Defendant) hereby moves this Honorable Court to grant her unopposed motion for a 14-day extension of time to file her response and/or cross-motion to Zeidy M. Ponce Conejo's (Plaintiff) Memorandum In Support Of Relief Requested In Plaintiff's Complaint (the Motion) (Docket No. 18). This is the first extension of time requested in the above-captioned matter. Defense counsel requests this additional time because she inadvertently incorrectly calendared the date for Defendant to respond to the Motion and requires additional time to adequately address the issues Plaintiff raises in the Motion. Defense counsel apologizes for any inconvenience. The current deadline is May 11, 2015. The new deadline will be

MOTION FOR EXTENSION & PROPOSED ORDER (CASE NO. 2:14-cv-01557-MMD-PAL)

1 May 25, 2015. Any reply thereto will be due June 15, 2015. The parties have further agreed that the
2 Court's Scheduling Order shall be modified accordingly.

3 Respectfully submitted,

4 Dated: May 12, 2015

DANIEL G. BOGDEN
United States Attorney

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7 By: /s/ Sharon Lahey
8 SHARON LAHEY
ASSISTANT REGIONAL COUNSEL

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10 **ORDER**

11 PURSUANT TO STIPULATION, IT IS SO ORDERED. DEFENDANT SHALL FILE HER
12 RESPONSE TO PLAINTIFF'S MEMORANDUM IN SUPPORT OF RELIEF REQUESTED IN
13 PLAINTIFF'S COMPLAINT ON OR BEFORE MAY 25, 2015. ANY REPLY THERETO SHALL BE
14 FILED ON OR BEFORE JUNE 15, 2015.

15 Dated: May 18, 2015

16 
17 HON. PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

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Attorneys for DEFENDANT

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CERTIFICATE OF SERVICE

I, Sharon Lahey, Assistant Regional Counsel, hereby certify that the following individual was served a copy of the foregoing **DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S MEMORANDUM IN SUPPORT OF RELIEF REQUESTED IN PLAINTIFF'S COMPLAINT** on May 12, 2015:

CM/ECF:

Marc V. Kalagian, Esq.
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E-mail: rohlfig.kalagian@rksslaw.com

Dated this 12th day of May 2015

/s/ Sharon Lahey

SHARON LAHEY

Assistant Regional Counsel